



Marceil Morrell\*\*  
Vice President & General Counsel - Florida

Associate General Counsel  
Anthony P. Gillman\*\*  
Leslie Reicin Stein\*

Attorneys\*  
Lorin H. Albeck            M. Eric Edgington  
Kimberly Caswell        Joe W. Foster  
Franklin H. Deak         Ernesto Mayor, Jr.

\* Licensed in Florida  
\*\* Certified in Florida as Authorized House Counsel

**GTE Telephone Operations**

One Tampa City Center  
Post Office Box 110, FLTC0007  
Tampa, Florida 33601  
813-224-4001  
813-228-5257 (Facsimile)

**ORIGINAL  
FILE COPY**

February 16, 1996

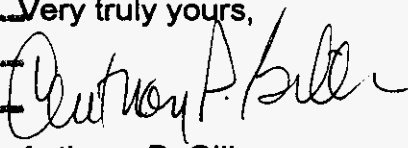
Ms. Blanca S. Bayo, Director  
Division of Records & Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 950984-TP  
Resolution of petition(s) to establish nondiscriminatory rates, terms and conditions for resale involving local exchange companies and alternative local exchange companies pursuant to Section 364.161, Florida Statutes


Dear Ms. Bayo:

Please find enclosed for filing an original and one copy of the Notice of Service of GTE Florida Incorporated's First Set of Interrogatories to Metropolitan Fiber Systems of Florida, Inc. in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions with regard to this matter, please contact me at 813-228-3087.

- ACK
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- LIN \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Very truly yours,  
  
Anthony P. Gillman

APG:tas  
Enclosures

RECEIVED & FILED  
  
EPSC-BUREAU OF RECORDS

A part of GTE Corporation

DOCUMENT NUMBER-DATE  
01906 FEB 19 96  
FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Resolution of petition(s) to establish )  
nondiscriminatory rates, terms and conditions )  
for resale involving local exchange companies )  
and alternative local exchange companies )  
pursuant to Section 364.161, Florida Statutes )

---

Docket No. 950984-TP  
Filed: February 16, 1996

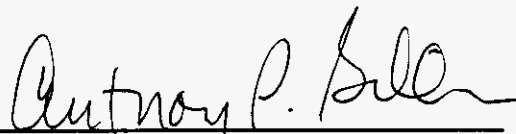
**NOTICE OF SERVICE OF GTE FLORIDA INCORPORATED'S  
FIRST SET OF INTERROGATORIES TO  
METROPOLITAN FIBER SYSTEMS OF FLORIDA, INC.**

NOTICE IS HEREBY GIVEN that GTE Florida Incorporated, by and through its undersigned counsel, has served its First Set of Interrogatories to Metropolitan Fiber Systems of Florida, Inc. by overnight delivery on February 15, 1996, to Richard M. Rindler, Esq., Swidler & Berlin, 3000 K Street, N.W., Suite 300, Washington, DC 20007 and Timothy Devine, MFS Communications Co., Inc., Six Concourse Parkway, Suite 2100, Atlanta, GA 30328.

The original and one copy of this Notice were hand-delivered on February 16, 1996 to the Director, Division of Records & Reporting, at the Commission. Further service on other parties of record is as set forth on the Certificate of Service, appended hereto.

Respectfully submitted on February 16, 1996.

By:



Anthony P. Gillman  
Kimberly Caswell  
Post Office Box 110, FLTC0007  
Tampa, Florida 33601  
Telephone: 813-228-3087

Attorneys for GTE Florida Incorporated

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Resolution of petition(s) to establish )  
nondiscriminatory rates, terms and conditions )  
for resale involving local exchange companies )  
and alternative local exchange companies )  
pursuant to Section 364.161, Florida Statutes )

---

Docket No. 950984-TP  
Filed: February 16, 1996

**GTE FLORIDA INCORPORATED'S FIRST SET OF INTERROGATORIES  
TO METROPOLITAN FIBER SYSTEMS OF FLORIDA, INC.**

GTE Florida Incorporated (GTEFL) requests that Metropolitan Fiber Systems of Florida, Inc. (MFS) answer the following interrogatories pursuant to Florida Rule of Civil Procedure 1.340. The interrogatories, attached as Attachment A, are to be answered separately and fully under oath by the responsible individual who is qualified and who is to be identified in accordance with the definitions and instructions set forth below.

**DEFINITIONS AND INSTRUCTIONS**

A. In these definitions and instructions, and in this set of interrogatories, the terms "you," "your" and "Company" mean Metropolitan Fiber Systems of Florida, Inc., including its predecessors, divisions, departments, officers, directors, managers, supervisors, attorneys, consultants, agents, representatives, and all other persons acting for or purporting to act for MFS.

B. Whenever appropriate in these definitions and instructions, and in this set of interrogatories, "and" as well as "or" shall be construed either disjunctively or conjunctively, "each" shall mean "each and every" and "all" shall mean "any and all" as necessary to bring within the scope of these interrogatories any information which might otherwise be construed to be outside their scope.

C. Each interrogatory shall be construed to include any supplemental information, knowledge, or data responsive to these interrogatories that you discover after responding to these interrogatories but before the hearing if the answer was incomplete at the time it was made.

Respectfully submitted on February 16, 1996.

By: 

Anthony P. Gillman  
Kimberly Caswell  
Post Office Box 110, FLTC0007  
Tampa, Florida 33601  
Telephone: 813-228-3087

Attorneys for GTE Florida Incorporated

## Attachment A


1. At page 12, lines 12-15 of his Direct Testimony in this docket, Mr. Timothy Devine states, "Presently, it is economically more efficient for competitors to utilize GTE loops at cost-based rates rather than to construct ubiquitous competing transmission and switching facilities." Is this statement based on assumption or is it based on any studies or analyses which attempt to determine the cost of constructing such "competing transmission and switching facilities?" If Mr. Devine relied on any studies, analyses, or other documentation in making this statement, please identify all such documentation by author, title, and date.
2. At page 13, lines 9-12 of his Direct Testimony in this docket, Mr. Devine states, "Replication of the existing LEC loop network (using either facilities similar to the incumbent LECs' or alternative technologies such as wireless loops or cable television plant) would be cost-prohibitive...." Is this statement based on assumption or is it based on any studies or analyses which attempt to calculate the costs of replicating the LECs' local loop network? If Mr. Devine relied on any studies, analyses, or other documentation in making this statement, please identify all such documentation by author, title, and date.
3. Does MFS offer its customers so-called term agreements, under which the customer takes service for a specified period of time? If your answer is yes, does MFS currently have any customers who have entered such term agreements with MFS? If so, what is the length of the term agreement(s) and what penalties or liabilities apply for early termination of the agreement(s)? Under what conditions, if any, would MFS waive any such termination penalties or liabilities?
- 4a. At page 25, lines 1-6 of his Direct Testimony, Mr. Devine states, "The major differences between these existing services and unbundled simple links are the additional performance parameters required for private line and special access services, beyond what is necessary to provide "POTS" (plain old telephone service); and the methods used by LECs to install and provision the services." Please specify and describe in detail the "additional performance parameters" Mr. Devine refers to.
- 4b. Did Mr. Devine rely on any provisioning and installation manuals or other documentation to support his idea that the LECs' methods of installation and provision of unbundled simple links are significantly different from installation and provisioning methods LECs use for special access lines? If so, please describe and identify such documentation by author, title, and date.
5. At page 26, lines 5-7 of his Direct Testimony, Mr. Devine states that "in most cases, the tariffed rate of a private line service exceeds the tariffed rate of a bundled dial tone business or residence line." Please describe and identify by

author, title, and date any documents Mr. Devine relied upon to support this statement.

6. At page 26, lines 7-8 of his Direct Testimony, Mr. Devine asserts that "private lines or special access channels are typically priced at substantial premiums today." Please describe and identify by author, title, and date any documents Mr. Devine relied upon to support this statement.
7. Has MFS done any forecasts of demand for the services it is asking GTEFL to provide on an unbundled basis?

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of GTE Florida Incorporated's First Set of Interrogatories to Metropolitan Fiber Systems of Florida, Inc. in Docket No. 950984-TP were sent via U.S. mail on February 16, 1996 to the parties on the attached list.

  
Anthony P. Gillman

Donna L. Canzano  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd., Room 370  
Tallahassee, FL 32399-0850

David B. Erwin  
Young VanAssenderp et al.  
225 S. Adams St., Ste. 200  
P.O. Box 1833  
Tallahassee, FL 32302

Donald L. Crosby  
Continental Cablevision, Inc.  
Southeastern Region  
7800 Belfort Parkway Suite 270  
Jacksonville, FL 32256-6925

Lee Willis  
Macfarlane Ausley et al.  
227 S. Calhoun Street  
Tallahassee, FL 32302

F. B. Poag  
Sprint/United-Florida  
555 Lake Border Drive  
Apopka, FL 32703

Peter Dunbar/Charles Murphy  
Pennington & Haben, P.A.  
215 S. Monroe St., 2nd Floor  
Tallahassee, FL 32302

James Falvey/Richard Rindler  
Swidler & Berlin  
3000 K Street, N.W., Ste. 300  
Washington, DC 20007

Jill Butler  
Florida Regulatory Director  
Time Warner Communications  
2773 Red Maple Ridge  
Tallahassee, FL 32301

Floyd R. Self  
Messer Capareello Madsen  
Goldman & Metz, P.A.  
215 S. Monroe St., Suite 701  
Tallahassee, FL 32302

J. Phillip Carver c/o Nancy Sims  
Southern Bell Tel. & Tel. Co.  
150 S. Monroe St., Suite 400  
Tallahassee, FL 32301

Andrew D. Lipman  
Metropolitan Fiber Systems of Fla.  
One Tower Lane, Suite 1600  
Oakbrook Terrace, IL 60181-4630

John Murray  
Payphone Consultants, Inc.  
3431 N.W. 55th Street  
Ft. Lauderdale, FL 33309-6308

Patricia Kurin  
Intermedia Comm. of Florida  
9280 Bay Plaza Blvd., Suite 720  
Tampa, FL 33619-4453

Gary T. Lawrence  
City of Lakeland  
501 East Lemon Street  
Lakeland, FL 33801-5079

Leslie Carter  
Digital Media Partners  
2600 McCormack Dr., Suite 255  
Clearwater, FL 34619-1098

Richard D. Melson  
Hopping Green Sams & Smith  
123 S. Calhoun Street  
Tallahassee, FL 32314

Michael W. Tye  
AT&T  
101 North Monroe St., Suite 700  
Tallahassee, FL 32301

Charles Beck  
Office of Public Counsel  
111 W. Madison St., Room 812  
Tallahassee, FL 32399-1400

Steven D. Shannon  
MCI Metro Access Trans.  
2250 Lakeside Boulevard  
Richardson, TX 75082

H. W. Goodall  
Continental Fiber Technologies  
4455 BayMeadows Road  
Jacksonville, FL 32217-4716

Richard A. Gerstemeier  
Time Warner AxS of Florida  
2251 Lucien Way, Suite 320  
Maitland, FL 32751-7023

Leo George  
Winstar Wireless of Florida  
1146 19th St., N.W., Suite 200  
Washington, DC 20036

Jodie Donovan-May  
Teleport Communications Group  
2 Lafayette Centre, Suite 400  
1133 21st Street, N.W.  
Washington, DC 20036

Patrick K. Wiggins  
Wiggins & Villacorta, P.A.  
501 E. Tennessee St., Suite B  
Tallahassee, FL 32308

Michael J. Henry  
MCI Telecommunications Corp.  
780 Johnson Ferry Rd., Suite 700  
Atlanta, GA 30342

Robin D. Dunson  
1200 Peachtree St., N.E.  
Promenade I, Room 4038  
Atlanta, GA 30309

Kenneth Hoffman  
Rutledge Ecenia et al.  
215 S. Monroe St., Suite 420  
Tallahassee, FL 32301



**Timothy Devine**  
MFS Communications Co. Inc.  
Six Concourse Pkwy., Ste. 2100  
Atlanta, GA 30328

**Laura Wilson/Charles Dudley**  
Florida Cable Telecomm. Assn.  
310 N. Monroe Street  
Tallahassee, FL 32301

**Graham A. Taylor**  
TCG South Florida  
1001 W. Cypress Creek Rd.  
Suite 209  
Ft. Lauderdale, FL 33309-1949

**Sue E. Weiske, Senior Counsel**  
Law Department  
Time Warner Communications  
160 Inverness Drive West  
Englewood, CO 80112

**C. Everett Boyd, Jr.**  
Ervin Varn Jacobs Odom & Ervin  
305 S. Gadsden Street  
Tallahassee, FL 32301

**Brian Sulmonetti**  
LDDS Communications Inc.  
1515 S. Federal Highway, #400  
Boca Raton, FL 33432-7404

**Benjamin Fincher**  
Sprint Communications Co.  
3065 Cumberland Circle  
Atlanta, GA 30339

**Bill Tabor**  
Utilities & Telecommunications  
Room 410 House Office Building  
Tallahassee, FL 32399

**Nels Roseland**  
Executive Office of the Governor  
Office of Planning and Budget  
The Capitol, Room 1502  
Tallahassee, FL 32399-0001

**Greg Krasovsky**  
Commerce & Economic Oppor.  
Room 426 Senate Office Building  
Tallahassee, FL 32399